

REMARKS

The Official Action dated July 22, 2003, has been carefully considered. Accordingly, the changes presented herewith, taken with the following remarks, are believed sufficient to place the present application in condition for allowance. Reconsideration and allowance of all remaining claims is respectfully requested.

Claims 1-6, 10-11, 15, 17-18, 24-25 and 29-31 have been amended, while claim 34 has been added, support for the amendments and added claim being found in the specification as filed. It is believed that these changes and additions do not involve any introduction of new matter, whereby entry is believed to be in order and is respectfully requested. Claims 1-34 remain in the application for consideration.

Applicants would like to thank the Examiner for the indication of allowance for claims 17-21 and 25. As claims 17-18 and 25 are now presented in independent form, Applicants believe that claims 17-21 and 25 are in prima facie condition for allowance, and request reconsideration and an early allowance.

In the Official Action, the Examiner required elections of species under 35 U.S.C. § 121 between a dye absorber (claim 28) and a particulate soil absorber (claim 29), and between a slot die coater (claims 5 and 30) and a spray coater (claim 31). Applicants hereby affirm the provisional election with traverse of claims directed to a dye absorber, and claims directed to a slot die coater. Claims 1-28, 30 and 32-33 are readable on the elected species. This election is made with traverse on the basis that continued examination of all claims in this application would not be unduly burdensome. Accordingly, reconsideration of the election requirement and examination of claims 1-34 are respectfully requested.

In the Official Action, the Examiner objected to claim 30 as not further limiting claim 5. However, claim 30 now depends from claim 4. In lieu of the amendment to claim 30,

Applicants believe that this claim objection is now moot and respectfully request reconsideration.

In the Official Action, claims 1, 3-6, 15, 18 and 30 have been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. This rejection is traversed and reconsideration is requested. While Applicants believe the original claims were clear, the present claims further clearly define the invention, whereby the Applicants believe that the rejection under 35 U.S.C. § 112, second paragraph, has been overcome.

Claims 1-16, 22-24, 26-28, 30 and 32-33 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the Foster et al European Patent No. EP 1 020 513 B1 (hereinafter referred to as "Foster et al"). The Examiner asserted that Foster et al disclose a laundry article having functionalized polyamine covalently bonded to a fibrous substrate, attached by a coupling agent, where the polyamine is a dye absorber. However, the Examiner noted that Foster et al fail to teach the method or order of application of the polyamine and coupling agent to the fibrous substrate, but asserted that it would have been obvious to one of ordinary skill in the art to select application methods such as those involving slot die coaters.

However, as will be set forth in detail below, it is submitted that the methods for manufacturing a laundry additive article as defined by claims 1-16, 22-24, 26-28, 30 and 32-33 are non-obvious over and patentably distinguishable from Foster et al. Accordingly, this rejection is traversed and reconsideration is respectfully requested.

The method for manufacturing a laundry additive article of the present application, as defined by claim 1, on which claims 2-16, 22-24, 26-28, 30 and 32-33 depend, includes providing a web of an insoluble substrate, applying a coating of a polymerizable or crosslinkable dye or particulate soil absorber to at least one face of the web, providing a cross-linker for the dye or particulate soil absorber to the web, drawing the coating and cross-linker into the web, and reacting the cross-linker with the dye or particulate soil absorber.

The application of the coating and the cross-linker can occur in either order.

However, Applicants find no teaching by Foster et al of the methods as defined by claim 1. That is, Foster et al disclose a laundry article for inhibiting transfer of extraneous dyes and soil to articles in a wash liquor (page 3, lines 44-45). The article includes a support matrix and a functionalized polyamine which is disclosed to be attached to or entrapped in the support matrix (page 3, lines 45-46). Applicants find no teaching or suggestion by Foster et al of a method for manufacturing a laundry additive article having a coating of a polymerizable or crosslinkable dye or particulate soil absorber and cross-linker drawn into the web of an insoluble substrate. Moreover, Applicants find no teaching in Foster et al of a reaction between a cross-linker and a dye or particulate soil absorber. Therefore, Applicants find no teaching of a method including drawing the coating and cross-linker into the web of an insoluble substrate.

Thus, the teachings of Foster et al do not render the limitations of claims 1-16, 22-24, 26-28, 30 and 32-33 obvious. Applicants find no teaching or suggestion to modify this reference to result in methods for manufacturing a laundry additive article including drawing a coating of the dye or particulate soil absorber and cross-linker into the web as defined by claims 1-16, 22-24, 26-28, 30 and 32-33. Foster et al provide no teaching or suggestion of the methods as employed in the present claims 1-16, 22-24, 26-28, 30 and 32-33.

It is well settled that to support a rejection under 35 U.S.C. § 103, a reference must provide an enabling disclosure, i.e., it must place the claimed invention in the possession of the public. *In re Payne*, 203 U.S.P.Q. 245 (CCPA 1979). The disclosure in Foster et al of attaching or entrapping polyamines to the support structure does not provide any suggestion or motivation to include drawing the coating of the dye or particulate soil absorber and cross-linker into the web of the insoluble substrate as set forth in claims 1-16, 22-24, 26-28, 30 and

32-33. Thus, Foster et al do not provide an enabling disclosure, and, therefore do not support a rejection under 35 U.S.C. §103.

It is therefore submitted that the methods for manufacturing laundry additive articles as defined by claims 1-16, 22-24, 26-28, 30 and 32-33 are non-obvious over and patentably distinguishable from Foster et al, and the rejection of claims 1-16, 22-24, 26-28, 30 and 32-33 under 35 U.S.C. § 103 has been overcome. Reconsideration is respectfully requested.

Claims 1-16, 22-24, 26-28, 30 and 32-33 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the Edwards I U.S. Patent No. 3,694,364 (hereinafter referred to as "Edwards I"). The Examiner asserted that Edwards I discloses a laundry article having a polyamine covalently bonded to a cellulosic substrate, attached by anionic active groups, where the polyamine is a dye absorber and dirt trapper. However, the Examiner noted that Edwards I fails to teach the method of application of the polyamine and anionic active groups to the substrate, but asserted that it would have been obvious to one of ordinary skill in the art to select application methods such as those involving slot die coaters.

However, as will be set forth in detail below, it is submitted that the methods for manufacturing a laundry additive article as defined by claims 1-16, 22-24, 26-28, 30 and 32-33 are non-obvious over and patentably distinguishable from Edwards I. Accordingly, this rejection is traversed and reconsideration is respectfully requested.

Applicants find no teaching by Edwards I of the methods as defined by claim 1. Edwards I discloses a laundering process employing an amine-coated modified cellulose substrate in an aqueous washing solution to trap dirt and organic anionic materials (col. 2, lines 3-6). The process includes coating the substrate, particularly cotton, with a polymeric amine and adding a water-soluble organic detergent to the substrate which is releasable from the substrate during the laundering process (col. 2, lines 14-33). Applicants find no teaching or suggestion by Edwards I of a method for manufacturing a laundry additive article having a

coating of a polymerizable or crosslinkable dye or particulate soil absorber and cross-linker drawn into the web of an insoluble substrate. Moreover, Applicants find no teaching in Edwards I of a reaction between a cross-linker and a dye or particulate soil absorber. Therefore, Applicants find no teaching of a method including drawing the coating of a dye or particulate soil absorber and cross-linker into the web of an insoluble substrate.

Thus, the teachings of Edwards I do not render the limitations of claims 1-16, 22-24, 26-28, 30 and 32-33 obvious. Applicants find no teaching or suggestion to modify this reference to result in methods for manufacturing a laundry additive article including drawing a coating of the dye or particulate soil absorber and cross-linker into the web as defined by claims 1-16, 22-24, 26-28, 30 and 32-33. Edwards I provides no teaching or suggestion of the methods as employed in the present claims 1-16, 22-24, 26-28, 30 and 32-33.

As noted, to support a rejection under 35 U.S.C. § 103, a reference must provide an enabling disclosure, i.e., it must place the claimed invention in the possession of the public. *In re Payne, supra*. The disclosure in Edwards I of coating the substrate, particularly cotton, with a polymeric amine and adding a water-soluble organic detergent to the substrate does not provide any suggestion or motivation to include drawing the coating of the dye or particulate soil absorber and cross-linker into the web of an insoluble substrate as set forth in claims 1-16, 22-24, 26-28, 30 and 32-33. Thus, Edwards I does not provide an enabling disclosure, and, therefore does not support a rejection under 35 U.S.C. § 103.

It is therefore submitted that the methods for manufacturing laundry additive articles as defined by claims 1-16, 22-24, 26-28, 30 and 32-33 are non-obvious over and patentably distinguishable from Edwards I, and the rejection of claims 1-16, 22-24, 26-28, 30 and 32-33 under 35 U.S.C. § 103 has been overcome. Reconsideration is respectfully requested.

Claims 1-16, 22-24, 26-28, 30 and 32-33 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the Edwards II U.S. Patent No. 3,673,110 (hereinafter referred to as

"Edwards II"). The Examiner asserted that Edwards II discloses a cellulosic substrate treated with anionic groups, and then with nitrogen compounds such as polymeric amines binding with the anionic groups, to create a laundry article that absorbs dyes and dirt. However, the Examiner noted that Edwards II fails to teach slot coating the two treatment compositions, but asserted that it would have been obvious to one of ordinary skill in the art to select application methods such as those involving slot coaters.

However, as will be set forth in detail below, it is submitted that the methods for manufacturing a laundry additive article as defined by claims 1-16, 22-24, 26-28, 30 and 32-33 are non-obvious over and patentably distinguishable from Edwards II. Accordingly, this rejection is traversed and reconsideration is respectfully requested.

Applicants find no teaching by Edwards II of the methods as defined by claim 1. Edwards II discloses a laundry operation for preparing a water-insoluble adsorptive mass including treating cellulosic particles, fibers or fabrics with a reagent which renders the surface anionic, and coating the anionic surface with a nitrogen compound (col. 2, lines 31-35). The substrate material has anionic functional groups on its surface which are free to chemically react with the nitrogen compound (col. 2, lines 57-60). Applicants find no teaching or suggestion by Edwards II of a method for manufacturing a laundry additive article having a coating of a polymerizable or crosslinkable dye or particulate soil absorber and cross-linker drawn into the web of an insoluble substrate. Moreover, Applicants find no teaching or disclosure by Edwards II where a cross-linker and a dye or particulate soil absorber are reacted. Therefore, Applicants find no teaching of a method including drawing the coating and cross-linker into the web of an insoluble substrate.

Thus, the teachings of Edwards II do not render the limitations of claims 1-16, 22-24, 26-28, 30 and 32-33 obvious. Applicants find no teaching or suggestion to modify this reference to result in methods for manufacturing a laundry additive article, particularly

including, drawing a coating of the dye or particulate soil absorber and cross-linker into the web as defined by claims 1-16, 22-24, 26-28, 30 and 32-33. Edwards II provides no teaching or suggestion of the methods as employed in the present claims 1-16, 22-24, 26-28, 30 and 32-33.

As noted, to support a rejection under 35 U.S.C. § 103, a reference must provide an enabling disclosure, i.e., it must place the claimed invention in the possession of the public. *In re Payne, supra*. The disclosure in Edwards II of treating cellulosic particles, fibers or fabrics with a reagent which renders the surface anionic, and coating the anionic surface with a nitrogen compound does not provide any suggestion or motivation to include applying a cross-linker to the coating of a dye or particulate soil absorber and drawing the coating and cross-linker into the web of an insoluble substrate as set forth in claims 1-16, 22-24, 26-28, 30 and 32-33. As such, Edwards II does not provide an enabling disclosure, and, therefore does not support a rejection under 35 U.S.C. § 103.

It is therefore submitted that the methods for manufacturing laundry additive articles as defined by claims 1-16, 22-24, 26-28, 30 and 32-33 are non-obvious over and patentably distinguishable from Edwards II, and the rejection of claims 1-16, 22-24, 26-28, 30 and 32-33 under 35 U.S.C. § 103 has been overcome. Reconsideration is respectfully requested.

Claims 1-16, 22-24, 26-28, 30 and 32-33 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the Johnson et al U.S. Patent No. 5,698,476 (hereinafter referred to as "Johnson et al"). The Examiner asserted that Johnson et al disclose a laundry article that includes a dye absorber such as an ammonium polymer resin, coupled to a fiber support matrix by chemical bonding through an intermediary such as an aziridino cross-linker. However, the Examiner noted that Johnson et al fail to teach a slot coater to apply the cross-linker and polymer, but asserted that it would have been obvious to one of ordinary skill in the art to select application methods such as those involving slot coaters.

However, as will be set forth in detail below, it is submitted that the methods for manufacturing a laundry additive article as defined by claims 1-16, 22-24, 26-28, 30 and 32-33 are non-obvious over and patentably distinguishable from Johnson et al. Accordingly, this rejection is traversed and reconsideration is respectfully requested.

Applicants find no teaching by Johnson et al of the methods as defined by claim 1. Johnson et al disclose an article for removing extraneous, random free-flowing dyes from washing applications, wherein the article includes a dye absorber and a dye transfer inhibitor introduced by a support matrix (col. 2, lines 49-53). The incorporation of the dye absorber onto the fabric substrate was achieved by using a coupling agent or a self cross-linking polymer (col. 10, lines 20-22). Applicants find no teaching or suggestion by Johnson et al of a method for manufacturing a laundry additive article having a coating of a polymerizable or crosslinkable dye or particulate soil absorber and cross-linker drawn into the web of an insoluble substrate. Therefore, Applicants find no teaching of a method including drawing the coating and cross-linker into the web of an insoluble substrate.

Thus, the teachings of Johnson et al do not render the limitations of claims 1-16, 22-24, 26-28, 30 and 32-33 obvious. Applicants find no teaching or suggestion to modify this reference to result in methods for manufacturing a laundry additive article, particularly including drawing a coating of the dye or particulate soil absorber and cross-linker into the web as defined by claims 1-16, 22-24, 26-28, 30 and 32-33. Johnson et al provide no teaching or suggestion of the methods as employed in the present claims 1-16, 22-24, 26-28, 30 and 32-33.

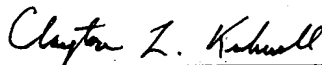
It is well settled that to support a rejection under 35 U.S.C. § 103, a reference must provide an enabling disclosure, i.e., it must place the claimed invention in the possession of the public. *In re Payne, supra*. The disclosure in Johnson et al of incorporating a dye absorber onto the fabric substrate by using a coupling agent or a self cross-linking polymer

does not provide any suggestion or motivation to draw the coating of the dye or particulate soil absorber and cross-linker into the web of an insoluble substrate as set forth in claims 1-16, 22-24, 26-28, 30 and 32-33. As such, Johnson et al do not provide an enabling disclosure, and, therefore do not support rejection under 35 U.S.C. § 103.

It is therefore submitted that the methods for manufacturing laundry additive articles as defined by claims 1-16, 22-24, 26-28, 30 and 32-33 are non-obvious over and patentably distinguishable from Johnson et al, and the rejection of claims 1-16, 22-24, 26-28, 30 and 32-33 under 35 U.S.C. § 103 has been overcome. Reconsideration is respectfully requested.

It is believed that the above amendments and remarks represent a complete response to the rejections under 35 U.S.C. §§ 103, 121, and 112, second paragraph, placing the present application in condition for allowance. Reconsideration and an early allowance are requested.

Respectfully submitted,



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